

On behalf of WBHM, licensed to the Board of Trustees of the University of Alabama System for the University of Alabama at Birmingham, I am writing to comment on FCC, MM Docket 99-325.

We encourage the Commission to authorize HD Radio Supplemental Audio Channels (SAC), or multiplexing for several reasons.

First, with multiplexing, we believe public radio in general, and WBHM in particular, will have greater ability to better serve their communities with diverse programming streams. WBHM currently provides a comprehensive local and national news and information service, along with classical music and entertainment programming. Multiplexing will allow us to expand our public service mission and enable us to expand programming to meet listener needs that are either underserved or not served at all.

Secondly, we believe the ability to provide high quality multiplexed services will be important factors in our decision to implement HD Radio at WBHM and an important factor in spurring consumer demand for HD receivers in the market.

WBHM strives to provide quality, in-depth programming to listeners in the Birmingham area. Multiplexing of the digital audio signal will enable us to provide programming to specific audiences that are currently not served. This could mean providing our main programming on the primary channel, and an additional service, such as different music programming on the supplemental channel. For our area it could mean Spanish language programming serving the growing Hispanic population in North Central Alabama.

The supplemental audio channel will provide WBHM with a very cost-effective means of expanding the quality, content and the quantity of local, diverse programming, thereby improving our overall public service to the Birmingham area.

Current analog technology limits WBHM to providing our main channel service and our SCA service to blind and print handicapped Alabamians. Digital broadcasting with multicasting capabilities will enable WBHM to use existing programs we do not carry, in expanded fashion. It will also provide the incentive to develop new, more varied and diverse programming, whose appeal may be more targeted and defined.

Providing supplemental audio channel service through HD Radio, in our listening area, would be tremendously cost-effective compared to the cost associated with acquiring analog frequencies in our listening area. It is cost-prohibitive for WBHM to purchase another frequency in the Birmingham market to expand our programming service and provide greater public service.

With the authorization of supplemental audio channels through HD Radio technology, the FCC's efforts to foster the development of a vibrant terrestrial digital radio service for the public will be well-served. Multiplexing will allow non-commercial educational stations to flexibly serve the needs and interests of our communities. WBHM and all of public radio share a mission to serve the public's educational needs and we have a proven track record of successfully doing so.

Public radio counts on the FCC to fully protect our ability to carry out our public service mission. Public radio stations need to generate revenue to fund our public services. The potential use of SAC technology for revenue generation purposes will strengthen our ability to better serve the public in the future.

The greatest advancement toward our mission of comprehensive public service is to allow maximum programmatic flexibility, without imposition of stringent costs associated with providing the service. In this respect, particularly in regard to various music licensing and rights issues, the operation of Supplemental Audio Channels would provide the best public service if regulation is similar to SCA services, as opposed to main channel services.

WBHM greatly appreciates the opportunity to express our views on this important public service issue.

Respectfully submitted,

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